

Item 1 – Introduction

Central Trust Bank (“Central”, “we” or “us”) is registered with the U.S. Securities Exchange Commission (“SEC”) as a registered investment adviser (“RIA”). Our investment advisory services and compensation structure differs from that of a registered broker-dealer, and it is important that you understand the differences.

Free and simple tools are available to research firms and financial professionals at www.Investor.gov/CRS. The site also provides educational materials about broker-dealers, investment advisers and investing.

Item 2 – Relationships and Services

What investment services and advice can you provide me?

We provide investment advisory services, including discretionary and non-discretionary management to individuals, trusts, estates, and businesses (our “retail investors”). We also provide retirement plan consulting services to participant-directed corporate retirement plans.

When a retail investor engages us to provide discretionary investment management services, we shall monitor, on a continuous basis, the investments in the accounts over which we have discretionary authority as part of our investment management service. Furthermore, when engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade, and allocate the investments within your account(s) consistent with the investment policy statement guidelines for the investment strategy you selected. If you have engaged us on a non-discretionary basis, we cannot complete any account transactions without obtaining your prior consent. Our authority over your account(s) shall continue until our engagement is terminated. Central does not offer financial planning or consulting services and shall only provide such services if specifically requested to do so. If a retail investor engages us to provide financial planning and consulting services, we rely upon the information provided for our review and do not verify or monitor any such information while providing this service. Unless provided separately from our investment advisory services as part of a financial planning & consulting engagement that is agreed to be an ongoing service, our financial planning and consulting services are completed upon the communication of our recommendations to the retail investor.

We do not limit the scope of our investment advisor services to proprietary products or a limited group or type of investments.

Additional Information: For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please See Items 4 and 7, respectively in our ADV Part 2A or Items 4 and 5 of the Part 2A Appendix.

Conversation Starters:

Given my financial situation, should I choose an investment advisory service? Why or why not?

How will you choose investments to recommend to me?

What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Item 3 – Fees, Costs, Conflicts, and Standard of Conduct

What Fees will I pay?

We provide our investment advisory services on a fee basis. The investment advisory fee is calculated as a percentage of the market value of your assets placed under our management (“AUM Fee”). Our annual AUM fee will generally range from 0.10% to 1.00% of client assets, depending on several factors including size of the account, the scope of services provided, and the type of assets being managed, among other factors. We typically deduct our AUM Fee from one or more of your investment accounts, monthly, in arrears, based upon the average daily market value of the assets in your account(s) during the previous month. Because our AUM Fee is calculated as a percentage of the market value of your assets under management, as the assets you have in your advisory account increase in value, the more you will pay us for our investment management services. Therefore, we have an incentive to encourage you to increase the assets maintained in accounts we manage.

Other Fees and Costs: Your investment assets will be held with a qualified custodian. Custodians generally charge brokerage commissions and/or transaction fees for effecting certain securities transactions (for example, transaction and redemption fees may be charged for certain mutual fund transactions). These charges will be assessed in accordance with the qualified custodian's transaction fee/brokerage commission fee schedule. If your assets are managed by a third-party manager, that manager may also assess an investment management fee, which fee is separate from and in addition to our fee. In addition, relative to certain mutual fund and exchange traded fund purchases, certain charges will be imposed at the fund level (e.g., management fees and other fund expenses).

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more detailed information about our fees and costs related to our management of your account, please See Item 5 in our ADV Part 2A.

Conversation Starters: *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What are your legal obligations to me when acting as my investment adviser?

When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. As examples: (a) we may recommend a particular custodian to maintain your assets, and we may receive support services from this custodian, certain of which assist us to better monitor and service your account, while a portion may be for the benefit of our firm, and/or (b) we may recommend rollovers out of employer-sponsored retirement plans and into Individual Retirement Accounts that we manage for an asset-based fee, which could have the effect of increasing our compensation.

Conversation Starter: *How might your conflicts of interest affect me, and how will you address them?*

Additional Information: For more detailed information about our conflicts of interest, please review our Form ADV Part 2A.

How do your financial professionals make money?

Our financial professionals are generally compensated on a salary basis. Financial professionals compensated on a salary basis do not receive additional compensation based upon the amount of assets they are responsible for managing nor do they receive higher compensation when working with complex portfolios. You should discuss your financial professional's compensation directly with your financial professional.

Item 4 – Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

No. We encourage you to visit www.Investor.gov/CRS to research our firm and our financial professionals.

Furthermore, we encourage you to ask your financial professional: *As a financial professional, do you have any disciplinary history? If so, for what type of conduct?*

Item 5 – Additional Information

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer, Robin Holzschuh, at any time to request a current copy of your ADV Part 2A or our *relationship summary*. Our Chief Compliance Officer may be reached by phone: (314) 219-0415.

Conversation Starter: *Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*